

UNREDACTED VERSION
OF EXHIBIT 17 SOUGHT
TO BE FILED UNDER
SEAL

From: "David W. Rizk" <DRizk@kvn.com>
To: Gary Brown [REDACTED], "Thomas E. Gorman" <TGorman@kvn.com>, Kristinn Gudjonsson [REDACTED]
Cc: Rachael Meny <Rmeny@kvn.com>
Subject: RE: 3. AnthonyL moma searches?
Sent: Thu, 2 Feb 2017 18:00:33 +0000

Got it thanks – we don't need your results then.

From: Gary Brown [mailto:someguyiknow@google.com]
Sent: Thursday, February 02, 2017 9:59 AM
To: David W. Rizk; Thomas E. Gorman; Kristinn Gudjonsson
Cc: Rachael Meny
Subject: Re: 3. AnthonyL moma searches?

I could, and will if you really want, but I don't think that'd help, and here's why:

MoMA is user- and permission-aware. It will present things as they are relevant and accessible to the user. Anthony's results were likely wildly different from those that are available to me. All the top pages for me are mentions of EVT and xVT for non-Chauffeur/X projects, as these are industry standard terms.

On Thu, Feb 2, 2017 at 9:41 AM David W. Rizk <DRizk@kvn.com> wrote:
 Would you mind sending us a screen shot of "xvt evt" moma search results?

From: Gary Brown [mailto:[REDACTED]]
Sent: Thursday, February 02, 2017 9:38 AM
To: David W. Rizk; Thomas E. Gorman; Kristinn Gudjonsson
Cc: Rachael Meny
Subject: Re: 3. AnthonyL moma searches?

Your guess is as good as mine for "xvt evt". As for [REDACTED], there's no glossary definition, but from perusing some code, I'm going to guess it stands for [REDACTED]

On Thu, Feb 2, 2017 at 9:27 AM David W. Rizk <DRizk@kvn.com> wrote:
 Ok. And can you tell us what "xvt evt" and [REDACTED] module chauffeur" refer to?
 Thanks, David

From: Gary Brown [mailto:[REDACTED]]
Sent: Wednesday, February 01, 2017 8:22 PM
To: Thomas E. Gorman; Kristinn Gudjonsson
Cc: David W. Rizk; Rachael Meny
Subject: Re: 3. AnthonyL moma searches?

The only explanation I have is that it's an anomaly in querying these old logs. For the same query run 3 times, two (an early one, and the one I just re-ran) had that [REDACTED] module search. The set I pulled that list from earlier today, run some time in between those two, had the searches before and after that one, but was missing that line.

Flakiness and errors in this kind of log diving is very common (for example, of the 8 queries I just re-ran, only 5 completed successfully. If I run them again, they may all complete, they may all fail, or a different set may succeed or fail). I always operated on the assumption that if I had results, they were authoritative, but clearly that's not the case.

On Wed, Feb 1, 2017 at 3:20 PM Thomas E. Gorman <TGorman@kvn.com> wrote:
 OK, then I guess Gary can cover the question on "xvt evt"?

Also, Gary, you sent an email last week (attached) that had at least one moma search ([REDACTED] module chauffeur") that wasn't included in the list from today. Why the discrepancy? Are you sure we have everything?

And what does [REDACTED] module chauffeur" lead to? Can you give us some color on what that relates to?

Thanks,

--Tom

From: Kristinn Gudjonsson [mailto:[REDACTED]]
Sent: Wednesday, February 01, 2017 1:41 PM
To: Thomas E. Gorman; Gary Brown
Cc: David W. Rizk; Rachael Meny
Subject: Re: 3. AnthonyL moma searches?

To answer some of these questions.

Security key is our second/dual factor and that search is done to figure out how to configure a new security key so that you can authenticate to Google properties, nothing to do with [REDACTED]

Broccoli man is a piece of Google's history.... a mandatory video every employee has to see ..

On Wed, Feb 1, 2017 at 1:32 PM Thomas E. Gorman <TGorman@kvn.com> wrote:

What does "register a new security key" return? Was he investigating anything related to [REDACTED] after reformatting a drive and/or installing a new OS?

Assuming those times are UTC, that "xvt evt" search is an hour before the SVN sync. What does that lead to? I assume EVT is Engineering Validation Test, and XVT is related to this concept.

And what in god's name is "broccoli man"?

--Tom

From: Gary Brown [mailto:[REDACTED]]

Sent: Wednesday, February 01, 2017 12:49 PM

To: Thomas E. Gorman

Cc: David W. Rizk; Rachael Meny; Kristinn Gudjonsson ([REDACTED])

Subject: Re: 3. AnthonyL moma searches?

Just happened to have these lying around.

2015-08-21T14:45:53+00:00	q=guest+presenting+on+gvc
2015-09-09T20:47:30+00:00	q=projec[REDACTED]
2015-09-09T20:47:43+00:00	q=project[REDACTED]
2015-09-18T18:46:37+00:00	q=transfer+reports
2015-09-18T18:50:55+00:00	q=transfer+reports+to+different+manager
2015-09-18T20:19:24+00:00	q=moving+reports+to+different+manager
2015-10-09T17:12:12+00:00	q=android+bazaar
2015-11-20T19:20:40+00:00	q=change+assignment+in+teams
2015-11-30T20:13:45+00:00	q=pay+stub
2015-12-02T19:07:54+00:00	q=register+a+new+security+key
2015-12-02T19:18:00+00:00	q=chauffeur+noogler
2015-12-03T20:07:53+00:00	q=chauffeur+svn+login
2015-12-03T20:08:09+00:00	q=chauffeur+svn+eee+setup
2015-12-04T00:39:55+00:00	q=broccoli+man

2015-12-09T23:23:52+00:00	q=development+nda
2015-12-09T23:24:28+00:00	q=google+x+nda
2015-12-10T18:01:02+00:00	q=tensor+flow+t-shirt
2015-12-10T18:01:15+00:00	q=tensorflow+shirt
2015-12-11T18:01:18+00:00	q=xvt+evt
2015-12-15T19:44:43+00:00	q=eng+level
2015-12-17T19:30:52+00:00	q=tech+levels
2015-12-22T19:30:47+00:00	q=bigstore
2016-01-05T21:18:46+00:00	q=my+grow+postings

On Wed, Feb 1, 2017 at 12:39 PM Thomas E. Gorman <TGorman@kvn.com> wrote:

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Gary—

Next request should be much simpler.

Can you please pull a list of anthonyl's moma searches from August 1, 2015 through his exit (Jan 27, 2016)?

Thanks,

--Tom

Thomas E. Gorman

Attorney at Law

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with regards

Kristinn

----- Forwarded message -----

From: Gary Brown [REDACTED]
To: "Thomas E. Gorman" <TGorman@kvn.com>, Kristinn Gudjonsson [REDACTED]
Cc: Rachael Meny <Rmeny@kvn.com>, Brian Ferrall <BFerrall@kvn.com>, "David W. Rizk" <DRizk@kvn.com>
Date: Thu, 26 Jan 2017 22:19:27 +0000
Subject: Re: Important question on AL drive activity

On Thu, Jan 26, 2017 at 10:04 PM Thomas E. Gorman <TGorman@kvn.com> wrote:

He didn't have a corp MacBook, so that's a personal laptop on the RLS network.

What does [REDACTED]? That's all the source code for the laser team, right?

There's definitely car + laser related code. Unsure if it's all of it, especially given the program's penchant for off-corp code repos (like [REDACTED])

Did he pull anything specific?

Doesn't look like it.

Based on your "footprints" report, it looks like he went to that link on 10/22, 11/3, 12/2, and 12/22. But I don't see the activity that you quoted on 1/5. And there's zero AL activity in this report. Do we not have the full picture on AL's activity in December 2015 and January 2016? Did we not pull his workstation activity?

I can't find my notes for the codesearch stuff I ran, but I have no explanation for his stuff not being in there. I went back and pulled what we have for his corp web activity between 12/01/15 and 1/05/16, and plan on going over it thoroughly tomorrow (will go back to June '15 if you want, let me know).

Unsure if you already have this, but I couldn't find it searching through the docs for him: I took a quick peek at his moma searches from December and these stuck out:

12/2/15 - search for "chauffeur noogler"

12/3/15 - searches for "chauffeur svn login" and "chauffeur svn eee setup"

12/7/15 - search for "[REDACTED] module chauffeur"

12/7/15 - searches for "development nda" and "google x nda"

12/11/15 - search for "xvt evt"

Thanks,
--Tom

From: Gary Brown [REDACTED]

Date: Thursday, January 26, 2017 at 1:23 AM

To: Thomas Gorman <TGorman@kvn.com>, Kristinn Gudjonsson [REDACTED]

Cc: Rachael Meny <Rmeny@kvn.com>, Brian Ferrall <BFerrall@kvn.com>, David Rizk <DRizk@kvn.com>

Subject: Re: Important question on AL drive activity

Those exports are from the RLS Guest network with a Mac user-agent. Being on Guest doesn't mean it isn't a corp machine, but IIRC, he didn't have a corp Macbook.

Also, I feel like we may have covered this with the codesearch, but couldn't find it in the spreadsheet I shared out way back when. This appears to be on his workstation (uccl2.mtv):

2016-01-05 21:20 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

On Thu, Jan 26, 2017 at 3:48 AM Thomas E. Gorman <TGorman@kvn.com> wrote:

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Gary / Kristinn--

In Gary's Drive Logs, a few exports have caught our attention.

- Three Docs that AL exported on Jan. 4 (in this report).

- Two Presos that AL exported on Jan. 4 (see [this report](#)).

All five documents relate to manufacture, calibration, and testing of different LiDAR sensors.

All of this activity was between 20:25 UTC and 20:35 UTC on Jan. 4., 2016. If I've done the time-zone conversion correctly, it is around 12:30 PM PST.

We're scouring his calendar and his email to make sense of these exports, but would very much appreciate any other information that you can offer. Can you determine what computer he was using (anthonyl0-w? anthonyl-glaptop? Another machine?) Any idea where he was connecting from? Can you piece together any other network activity by Anthony that day?

Anything you can tell us would be helpful.

Thanks in advance,

--Tom

Thomas E. Gorman

Attorney at Law

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